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UNITED STATES OF AMERICA : Criminal No. 18- 162 (NLH)

v. :

JOSEPH BRODIE : 18 U.S.C. §§ 115(a)(1)(B) and  
(b)(4)**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

**Count 1****(Threats to Officials, Officers, and Employees of the United States)**

1. At all times relevant to this Indictment:
  - a. Defendant JOSEPH BRODIE was a resident of Millville, Cumberland County, New Jersey.
  - b. Official 1 was a United States Congressman, whose identity is known to the members of the grand jury.
  - c. Official 2 was a member of Official 1's staff, whose identity is known to the members of the grand jury.
  - d. Official 3 was a member of Official 1's staff, whose identity is known to the members of the grand jury.
  - e. Official 1 maintained an Office in Mays Landing, Atlantic County, New Jersey (the "New Jersey Congressional Office"), where Official 2 and Official 3, at times, worked.

f. The United States Department of Veterans Affairs (“VA”) was a United States Government agency responsible for, among other things, providing healthcare services to eligible military veterans at VA medical centers and clinics located throughout the country as well as benefits and services that provided financial and other forms of assistance to military service members, veterans, dependents, and survivors.

2. From at least in or about January 2011 to in or about September 2017, defendant JOSEPH BRODIE received services from the VA.

3. Beginning at least in or about April 2017, defendant JOSEPH BRODIE became increasingly dissatisfied with the level of care that he received from the VA and began contacting members of Official 1’s staff to report his dissatisfaction. In defendant JOSEPH BRODIE’s communications with members of Official 1’s staff, defendant JOSEPH BRODIE requested that Official 1 use his official position to act on defendant JOSEPH BRODIE’s behalf regarding the care that defendant JOSEPH BRODIE was receiving at the VA. Defendant JOSEPH BRODIE’s communications often included agitated demands and resulted in two threatening communications on September 19, 2017.

4. On or about September 15, 2017, defendant JOSEPH BRODIE sent an email to Official 3's congressional email account, which Official 3 received at the New Jersey Congressional Office. The email contained the subject line "[Reference to Official 1] PLEASE READ THIS" and the following content:

Sir,

I sent you a fax. Fuck you. My next message is a "FIX THE VA" t-shirt to your family and office. I'm sure you take your work home too but I gotta make sure you take it home because I'm going to make sure that you get shit delivered to your home address to make sure that you know veterans are being ABUSED and if you have any problem you just ask [reference to Official 3].

Hell hath no fury...

You have no idea.

I just want to remind you...

you and all of your staff, your family, your friends...

5. On or about September 19, 2017, at approximately 1:30 p.m., defendant JOSEPH BRODIE attempted to contact Official 2 at Official 1's Washington D.C. Office and was transferred by staff in that office to Official 2 at the New Jersey Congressional Office. During the call, defendant JOSEPH BRODIE used verbally aggressive language toward Official 2, emphasized that Official 2's name, residence, address, and social media's accounts, and those of Official 2's family could be found online, and told Official 2 that he intended to bring his concerns with the VA to the attention of the media. After Official 2 told defendant JOSEPH BRODIE that he was free to speak to the media,

defendant JOSEPH BRODIE told Official 2, "you're a dead man" and hung up the phone.

6. On or about September 19, 2017, in Atlantic County, in the District of New Jersey and elsewhere, defendant

JOSEPH BRODIE

did knowingly threaten to assault and murder an official whose killing would be a crime under Title 18, United States Code, Section 1114, namely Official 2, with intent to impede, intimidate, and interfere with such official while engaged in the performance of official duties and with intent to retaliate against such official on account of the performance of official duties.

In violation of Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4).

**Count 2**

**(Threats to Officials, Officers, and Employees of the United States)**

1. The allegations set forth in paragraphs 1 through 5 of Count 1 of this Indictment are realleged and incorporated herein.

2. On or about September 19, 2017, at approximately 4:08 p.m., defendant JOSEPH BRODIE sent an email to Official 3's congressional email account, which was received at the New Jersey Congressional Office in the District of New Jersey. The email contained the subject line "Is this correct?" and the following content:

I'd love to have that face to face with [reference to Official 1]. If not today, that's fine...I'm still acclimating myself to this Google earth App. See where your office is and how easy it is to find?

It even shows the environment and surrounding terrain, parking lots, wooded areas, etc., (like the kind a highly trained Combat Infantryman would use)...

The email also contained an attachment with a map of the area of Official 1's New Jersey Congressional Office, labeled with a pinpoint cursor marking the precise location of the New Jersey Congressional Office and labeled with Official 1's name.

3. On or about September 19, 2017, after Official 3 received the email, Official 2 and Official 3 reported to Official 1 the threats received from defendant JOSEPH BRODIE as set forth in paragraph 5 of Count 1 of this Indictment and paragraph 2 above.

4. On or about September 19, 2017, after the communications set forth in paragraph 5 of Count 1 and paragraph 2 above, defendant JOSEPH BRODIE sent a text message to third party, which read "I threaten [sic] the life

of a congressman's chief of staff. I'm pretty sure the secret service are going to investigate. I'm filling the sandbags now to have a bunker by my house. I'm not going down without a fight[.]"

5. On or about September 19, 2017, in Atlantic County, in the District of New Jersey and elsewhere, defendant

JOSEPH BRODIE

did knowingly threaten to assault and murder a United States official and officials whose killing would be a crime under Title 18, United States Code, Section 1114, namely Officials 1, 2, and 3, and other members of Official 1's staff, with intent to impede, intimidate, and interfere with such officials while engaged in the performance of official duties and with intent to retaliate against such officials on account of the performance of their official duties.

In violation of Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4).

A TRUE BILL

FOREPERSON

*Craig Carpenito*  
CRAIG CARPENITO  
United States Attorney